Standard Form 278 Executive Branch Personnel PUBLIC FINANCIAL DISCLOSURE REPORT

Instructions for Completing SF 278

I. Introduction

Reporting Periods

Incumbents: Complete Schedules A, B, C, and Part I of D. The reporting period is the preceding calendar year, except Part II of Schedule C and Part I of Schedule D where you must also include any positions held and agreements or arrangements made from the beginning of the filing year until the date you file. Schedule B need not include transactions made, or gifts or reimbursements received, during a period when the filer was not a Federal

Termination Filers: Complete Schedules A, B, C, and Part I of D. The reporting period begins at the end of the period covered by your previous filing and ends at the date of termination of Government employment in the

Nominees, New Entrants and Candidates for President and Vice President: Complete Schedules A, C, and D (candidates do not file Part II of Schedule D),

- Schedule A The reporting period for income (BLOCK C) is the preceding calendar year and the current calendar year up to the date of filing. Value assets in BLOCK B as of any date you choose that is
- Schedule C, Part I (Liabilities) The reporting period is the preceding calendar year and the current calendar year up to any date you choose that is less than 31 days before the date of filing.

- Schedule C, Part II (Agreements or Arrangements) Show any agreements or arrangement as of the date of filing
- **Schedule D** The reporting period is the preceding two calendar years and the current calendar year up to the date of filing

Scope of Disclosure

The extent of the reporting requirement is noted in each schedule. The various schedules of this form require reporting of your financial interests and activities, both in the U.S. and abroad, except as otherwise noted. In addition to your individual financial information, you are required to report information concerning your spouse and dependent children in several schedules of the form. However, no report is required with respect to your spouse if he or she is living separate and apart from you with the intention of terminating the marriage or providing for permanent separation. In addition, no report is required with respect to any income or obligations of an individual arising from the dissolution of marriage or permanent separation from a spouse. There are other exceptions to the reporting of assets and income, transactions, and liabilities of a spouse or

A basic premise of the statutory financial disclosure requirements is that those having responsibility for review of reports filed pursuant to the Ethics in Government Act or permitted public access to reports must be given sufficient information by reporting individuals concerning the nature of their outside interests and activities so that an informed judgment can be made with respect to compliance with applicable conflict of interest laws and standards of conduct regulations. Therefore, it is important that you carefully complete the attached form. This report is a safeguard for you as well as the Government, in that it provides a mechanism for determining actual or potential conflicts between your public responsibilities and your private interests and activities and allows you and your agency to fashion appropriate protections against such conflicts A Presidential nominee and consent of the Se committee considering the initial report, which income and honoraria earlier than 5 days be Senate committee he update shall be provide Senate committee con shall be provided to

Defin

Category of Amoun

Reportable financial i actual amount or by cathe interest, as specifie are not required to, ind form provides for a cate

• Dependent Child

The term "dependent c stepson, or stepdaugh unmarried, under age 2" (2) a "dependent" of yo 152 of the Internal Revo

• Excepted Investmen

An excepted investmen trust fund of a bank, p plan, or any other invheld; publicly traded (o and under circumstan control over nor have the financial interests h diversified when it holof its portfolio in the s than the U.S. Governmental particular economic or s

• Gifts

See instructions for Schedule B, Part II.B.

• Honoraria

The term "honoraria" means payments of money or anything of value to you and your spouse for an appearance, speech, or article, excluding necessary travel expenses. See 5 U.S.C. app. § 505(3).

• Personal Savings Account

The term "personal savings account" includes a certificate of deposit, a money market account, or any other form of deposit in a bank, savings and loan association, credit union, or similar financial institution.

• Trusts ("Qualified" and "Excepted")

See instructions for Schedule A, Part II.B., and 5 C.F.R. Part 2634, Subpart D.

• Value

You may use any one of the methods described below, in determining fair market value:

Option 1 - any good faith estimate of the value of the property if the exact value is unknown or not easily obtainable.

Option 2 - value based upon a recent appraisal of the property interest;

Option 3 - the purchase price of your property interest, or estimated retail price of a gift;

Option 4 - the assessed value of the property for tax purposes, adjusted to reflect current market value if the tax assessment is computed at less than 100% of current value:

Option 5 - the year-end book value of non-publicly traded stock, or the year-end exchange value of corporate stocks, or the face value of corporate bonds or comparable securities:

Option 6 - the net worth of your interest (as in a business partnership or other jointly held business

Option 7 - the equity value of your interest (as in a solely owned business or commercial enterprise); or

Option 8 - exact value (e.g., personal savings accounts) or any other recognized indication of value (such as last sale on a stock exchange).

II. Who Must File

a. Candidates for nomination or election to the office of President or Vice President.

b. Presidential nominees to positions requiring the advice and consent of the Senate, other than those nominated for judicial office or as a Foreign Service Officer or for appointment to a rank in the uniformed services at a pay grade of O-6, or below.

c. The following newly elected or appointed officials:

- The President;
- The Vice President;
- Officers and employees (including special Government employees, as defined in 18 U.S.C. § 202) whose positions are classified above GS-15 of the General Schedule, or the rate of basic pay for which is fixed, other than under the General Schedule, at a rate equal to or greater than 120% of the minimum rate of basic pay for GS-15 of the General Schedule.
- Members of the uniformed services in pay grade O-7 or above;

- Officers or employed determined by the Dire Ethics to be of equal class.
- Administrative law ju
- Employees in the example are of a confidential or by regulation their post Director of the Office of
- The Postmaster General, each Governor of U.S. Postal Service and Postal Service or Postal for which the rate of bath 120% of the minimum
- The Director of the (each designated agency
- Civilian employees President (other than who hold commission President
- d. Incumbent officials section II.c. of these in days or more in the calendar year.
- e. Officials who have t ing served 61 days o position referred to in s another such position v

III. When to File

a. Within 30 days after nation or election to 1

President, or by May 15 of that calendar year, whichever is later, but at least 30 days before the election, and on or before May 15 of each succeeding year an individual continues to be a candidate.

- b. At any time after the President or President-elect has publicly announced an intention to nominate an individual referred to in section II.b. of these instructions, but no later than 5 days after the President transmits the nomination to the Senate.
- c. Within 30 days after assuming a position described in section II.c. unless such an individual has left another such position within 30 days prior to assuming the new position, or has already filed a report with respect to nomination for the new position (section II.b.) or as a candidate for the position (section II.a.).
- d. No later than May 15th annually, in the case of those in a position described in section II.d.
- e. In the event an individual terminates employment in the position and does not accept another position described in section II.c. within 30 days, the report must be filed no later than the 30th day after termination.
- f. Extensions. An employing agency may grant an extension of time of up to 45 days to a filer to file any report under sections III. c.-e. above (the FEC for any report under section III. a. above). OGE may grant an additional extension of time up to 45 days to file any such report.
- g. Fee for Late Filing. Any individual who is required to file this report and does so more than 30 days after the date the report is required to be filed, or, if an extension is granted, more than 30 days after the last day of the filing extension period, shall be subject to a \$200 late filing fee. A report is considered to be filed when it is received by the agency. Unless waived by OGE, such fee will be collected by the filer's agency, for deposit with the U.S. Treasury.

IV. Where to File

- a. Candidates for President and Vice President, with the Federal Election Commission.
- b. The President and Vice President, with the Office of Government Ethics.
- c. Members of a uniformed service, with the Service Secretary concerned.
- d. All others, with the designated agency ethics official, or that official's delegate, at the agency in which the individual serves, will serve or has served.
- e. In the case of individuals nominated by or to be nominated by the President to positions requiring confirmation of the Senate, see 5 C.F.R. Part 2634 for expedited procedures and filing location.

V. General Instructions

a. This form consists of the front page and four Schedules. If possible, use a black ink pen or typewriter to fill out your report. You must complete each Part of all Schedules as required. If you have no information to report in any Part of a Schedule, you should indicate "None." If you are not required to complete Schedule B or Part II Schedule D, you should leave it blank. Schedule A combines a report of income items with the disclosure of certain property interests. Schedule B deals with transactions in real property or certain other assets, as well as gifts and reimbursements. Schedules C and D relate to liabilities and employment relationships. After completing the first page and each Part of the Schedules (including extra sheets of any Schedule where continuation pages are required for any Part), consecutively number all pages.

- b. The information to b Ethics in Government Act), and 5 C.F.R. Par may, however, include beyond those requirempurposes of clarification not authorize any holdic transactions, gifts, repositions otherwise prorule or regulation.
- c. Combine on one for yourself, your spouse a convenient, use separat information applicable you desire, distinguish preceding the entry wi (DC) if it pertains to a be indicated by a (J). So for exclusions in the case
- d. Definitions of the va tions and detailed info be disclosed are contain
- e. In the case of referen trades or businesses wl you must provide suf private entities to give report an adequate b required by the Act. location and primary entities, as well as attrisolely incidental to su For instance, if your a corporation incurs a lihouse for investment business, you will have investment as part of a family corporation.

f. In the case of references to entities which are investment funds such as mutual or pension funds (whether public or private), you must disclose the portfolio holdings and all other items such as transactions and liabilities to the extent otherwise required for reportable interests, unless the entity is an "excepted investment fund." See Definition of Terms above.

g. If you need assistance in completing this form, contact the designated agency ethics official of the agency in which you serve, will serve, or have served.

Schedule A

I. General Instructions

Two of the general disclosure requirements of the Act concern certain interests in property (generally referred to here as assets) and items of income. Schedule A is designed to enable you to meet both of these reporting requirements. Generally a description of your, your spouse's, and your dependent child's assets and sources of income is required to be listed in BLOCK A of the Schedule. Reading from left to right across the page from each description of the asset or income source, you will be able to report in BLOCK B the value of each asset, and in BLOCK C the type and amount of income generated by that asset or received from the non-asset source.

On Schedule A are four examples which are representative of the reporting scheme of this Schedule. The first example represents the proper method of reporting stock of Central Airlines Company held at the end of the reporting period which then had a value of \$75,000. The individual had also received dividends of \$1,500, reported in BLOCK C. If the Central Airlines stock had been sold, there would be a check in the "None (or less the \$1,001)" column in BLOCK B if the individual no longer owned any of the stock at the end of the reporting period, and there would be an entry for capital gains as well as dividends in BLOCK C if they were realized

the proper method of reporting the source of \$130,000 of earned income from private law practice, as well as \$18,500 the reporting individual maintained in the capital account in the law firm at the end of the reporting period.

The third example represents acceptable reporting of an investment fund which is widely held, widely diversified (or publicly traded) and independently managed. Because it meets these requirements, no individual assets of the fund need to be reported, and the type of income does not need to be broken into dividends, interest, or capital gains as long as the column for "excepted investment fund" is marked. The fourth example reports a mutual fund held in an IRA from which the filer has accrued dividends of \$10,000.

Normally you will have to list an item only once in BLOCK A with all other value and income information associated with that item shown on the same line to the right. However, when you have a number of different kinds of financial arrangements and income involving one entity, a full disclosure of all the required information for that entity may require more than one line. You may always use more than one line for clarification if you choose.

II. Property Interests and Assets

(BLOCKS A and B)

A. Items to Report

Report the identity and category of valuation of any interest in property (real or personal) held by **you**, **your spouse or dependent child** in a trade or business, or for investment or the production of income which has a fair market value which **exceeds \$1,000** as of the close of the reporting period. These interests include, but are not limited to, stocks, bonds, pension interests and annuities, futures contracts, mutual funds, IRA assets, tax shelters, beneficial interests in trusts, personal s a v i n g s o r o t h e r

bank accounts, real est accounts or other funds held for resale or inves personal residence (unliability owed to you, by a spouse or depende sister or child of you, Exclude any retiremer Savings Plan) from Forand any social securideposits aggregating \$5

With respect to assets do not report items:

- (1) which represent yc sole financial interest o have no knowledge;
- (2) which are not in a from your income, asse
- (3) from which you ne any financial or econom

Note: It is very difficulathree parts of this test you file a joint tax returninancial or economic be you are charged with k for the education of you a financial benefit to income items do not fit

A personal residence h of income, such as a sur the year, must be repor

Intermittent sales from tions of antiques or ar items are held for in income and should ther

B. What to Show on the Form

Enter the identity of the asset in BLOCK A and then show the value in BLOCK B. Only the category of value, rather than the actual value of the property interest or asset, must be shown. You need not disclose which valuation methods you used.

For assets such as stocks, bonds, and securities, report any holdings directly held or attributable to you, your spouse or dependent child from one source totaling more than \$1,000 in value. Identify the holding and show the category of value. If you hold different types of securities of the same corporation (e.g., bonds and stocks of "X" Corporation), these holdings should be considered as being from the same source for purposes of determining whether the aggregate value of the interest is below or above the \$1,000 threshold value. Report personal savings accounts only if they aggregate more than \$5,000 in a single financial institution.

If you have an interest in an investment fund or pool which is an "excepted investment fund" (see Definition of Terms above), you need only identify the interest by giving the complete name of the fund, rather than identifying the underlying assets as well.

To report interests of you, your spouse, or dependent child in a business, a partnership, or joint venture, or the ownership of property held for investment or the production of income, identify the character of the ownership interest, and the nature and location of the business or interest, unless it is a publicly traded security. For example, the entry for a holding of farm land might show, under BLOCK A... "sole ownership of 100 acres of unimproved dairy farmland on Rural Route #1 at Pine Bluff, Madison County, Wisconsin."

You must disclose the primary trade or business of nonpublic entities, as well as interests and activities not solely incidental to such a trade or business. For example, if your family is involved in a private real estate investment business but as a side interest buys stock through the business in a bank, you must disclose that in addition to real estate (by type and general location), the family business holds an interest in a bank.

For an IRA (Individual Retirement Account), indicate the value of each underlying asset, as well as the income derived therefrom (even though deferred for Federal tax purposes) in accordance with section IV below, to enable the reviewer to evaluate compliance with applicable laws and regulations. If the IRA were invested solely in a mutual fund such as "Templeton World Fund, Inc." and the investment properly disclosed in Schedule A, that would be sufficient identification of the asset, since for most reporting individuals that fund would be an "excepted investment fund." If, however, the IRA had an individual or privately managed portfolio, detailed disclosure of the portfolio would be required on Schedule A in the same amount of detail as if each investment

with respect to trusts in which a vested beneficial interest in principal or income is held, or as to which you serve as trustee, report trust interests and trust assets which had a value in excess of \$1,000. See 5 C.F.R. Part 2634 for more information about vested interests.

You need not report the identity of assets of a trust of which you, your spouse or dependent children are the beneficiaries if the interest is:

1. a "qualified blind trust" or "qualified diversified trust," which has been certified by the Office of Government Ethics, in accordance with 5 C.F.R. Part 2634, Subpart D. or

2. an "excepted trust," that is, one which:

A. was not created by you or your spouse or dependent children, and

B. has holdings or s your spouse and depend

In the case of these sp show in BLOCK A th the date of creation classification of the ti "excepted trust." You the category of the tot qualified blind or qual trust instrument was e and precludes the benef on the total cash valu category of amount of \$200, must also be repo with section IV below.) **Note:** You are not per an excepted trust by in information or otherwi knowledge upon enterir

Do not report a tru dependent child is a bei test set forth in the so trust that does not fit excepted trust under the be reported, but the ass

Except for the special pyou must identify each trust or fund, which had example, in BLOCK A First National Bank (1) stock, U.S. Treasury c Bonds" might be mad value of each trust asseunder IV.B.6. Trust Ir each asset would be e income from assets of t period.)

III. Earned and Other Non-Investment Income

(BLOCKS A and C)

A. Items to Report

For yourself, report the identity of the source in BLOCK A and the type and **actual** amount in BLOCK C of non-investment income **exceeding \$200** from any one source. Such income includes fees, salaries, commissions, compensation for personal services, retirement benefits, and honoraria. Report these items on the same line as related interests in property, if any.

For your spouse, report the source, but not the amount, of non-investment income exceeding \$1,000 and the source, amount and date of honoraria exceeding \$200 from any one source. No report of the earned or other non-investment income of your dependent children is required.

Exclude for yourself and spouse income from employment by the United States Government and from any retirement system of the United States (including the Thrift Savings Plan) or from social security.

B. What to Show on the Form

1. HONORARIA - For you or your spouse, show honoraria aggregating more than \$200 from any one source. Report the identity of the source in BLOCK A, and the date of the services performed and actual amount in BLOCK C. List each honorarium separately. For example, if, prior to your Government service, you received \$1,500 for a speech before the Chicago Civic Club on March 19, 1999 of which \$200 was actually spent for round-trip travel, and \$200 went to the agent who made the speaking arrangement, on your new entrant report you would enter in BLOCK A... "Chicago Civic Club, 18 Lakeshore Dr., Chicago, IL"; in BLOCK C under OTHER (specify type)... "Honorarium"; for

ACTUAL AMOUNT... "\$1,100," and under DATE... "3/19/99." Honoraria received and donated to charity must be reported, but a notation explaining that fact may be included in reporting such items. The source, date and amount of payments made or to be made directly to a charitable organization in lieu of honoraria must also be disclosed.

2. EARNED AND OTHER NON-INVESTMENT **INCOME** - Include all income, exclusive of honoraria, from non-investment sources including fees, commissions, salaries, and income from personal services or retirement. Report the identity of the source and give the actual amount of such income exceeding \$200 from any one source. For example, if you earned \$450 teaching at a law school, enter in BLOCK A... "John Jones Law School, Rockville, MD"; in BLOCK C under OTHER... "Salary"; and under ACTUAL AMOUNT... "\$450." If you earned \$75 for teaching in one law school and \$250 from teaching at another school, report only the \$250 amount. Report employee benefits and severance payments which meet the reporting frequirements separately from salary in excess of \$1,000 (other than honoraria) from any one source, identify the source but show nothing under amount. If your spouse is self-employed in a business or profession, for example as a practicing psychologist who earned \$10,500 during the year, you need only show under BLOCK A... "practicing psychologist."

IV. Investment Income

(BLOCKS A and C)

Report items of investment income on the same line of Schedule A as the related property interest or other asset from which income is derived. Note that some property interests or other assets will not have a related item of income. In such a case, check "None (or less than \$201)" in BLOCK C under category of amount.

A. Items to Report

Report the identity in E in BLOCK C of any in any one source receive you, your spouse of reporting period. For 1 you meet the over \$20 you must aggregate all that same source. For such income is only re source meets the report Investment income incl derived from dealing royalties, dividends, car the investment portion endowment contract partnership or joint v income, and income fro You need not show dividends, rents and ro income from qualifi excepted investment fi income, you need only the item reported. For described in item 7 be actual dollar amount c indicate the type in th (Specify Type & Actua

B. What to Show on t

Check all applicable corresponding catego one type of income is d all relevant types (unle and categories of amou distinguished by using in the boxes, in lieu or rents/royalties, interest

1. DIVIDENDS - Show in BLOCK C the amount you, your spouse or dependent child accrued or received as dividends from investment sources including common and preferred securities and underlying assets of pensions and mutual funds (unless an excepted investment fund). Identify the source of such income and check the category of amount. For example, if cash dividends of \$950 were received for shares of common stock of IBM, enter in BLOCK A... "IBM common" and in BLOCK C check that dividend income was received and check the appropriate category of

amount 2. RENTS AND ROYALTIES - Show income accrued or received by you, your spouse or dependent child as rental or lease payments for occupancy or use of personal or real property in which any one of you has an interest. In addition, show payments accrued or received from such interests as copyrights, royalties, inventions, patents, and mineral leases or other interests. Identify the source of such income and check the category of amount. For example, if you received \$2,000 as rental income from an apartment building in Miami, Florida, enter in BLOCK A... "apartment building at 5802 Biscayne Blvd., Miami, FL," and in BLOCK C check that rental income was received and check the 3. IN TEREST Propriet Sales and the category of amount of any interest accrued or received by you, your spouse or dependent child as income from investment holdings including: bills and notes, loans, personal savings accounts, annuity funds, bonds, and other securities. For example, if you earned \$300 in interest during the calendar year on a Savings Certificate with Federal Savings and Loan, enter in BLOCK A... "Federal Savings and Loan (Baltimore, MD)-Savings Certificate," and in BLOCK C check that interest income was received and check the appropriate category

4. CAPITAL GAINS - Report income from capital gains realized by **you**, **your spouse or dependent child** from sales or exchanges of property, business interests, partnership interests or securities. **Identify the source**

of amount.

and check the category of amount of the gain. An example of an entry in BLOCK A might be "sale of one-third interest in 100-acre farm in Hamilton County, Iowa" and in BLOCK C check that capital gains were received and check the appropriate category of amount.

5. INVESTMENT FUND INCOME - Identify the fund and the category of amount and the type(s) of income from investment funds such as mutual or pension funds for you, your spouse or dependent child. This may include dividends, capital gains and interest for a single fund or income from an excepted investment fund. Income from each individual asset of the fund must also be listed, unless it is an excepted investment fund, in which case income from individual assets is not required to be listed. See Definition of Terms above for discussion of excepted investment 6. TRUST INCOME - Report the category of amount and the type of income accrued or received from any trust. Whenever you are required to identify the source of trust income, either for yourself or for a spouse or dependent child, it is not enough simply to say "John Jones Trust." Generally, the investment holdings of the trust, discussed above under "Property Interests and Assets," and the income derived from each holding must be identified to the same extent as if held directly. However, if the trust is a qualified trust or an excepted trust, in BLOCK A show only the identity of the trust including the date of creation, in BLOCK B the category of the total cash value of your interest (if a qualified trust), next to BLOCK C check the classification of the trust interest as a "qualified trust" or "excepted trust," and in BLOCK C show the category of amount of income attributable to you, your spouse or dependent ThiQTHER INVESTMENT INCOME - Report any other items of investment income exceeding \$200 and not described above, along with the specific type and actual amount, such as gross income from business interests, endowment or annuity contract payments, estate income, a distributive share of a partnership or joint business venture income. To identify the sources of other investment incon or a dependent child, the nature of the busin when applicable, the loownership in a retail fu Chicago, IL." In BLOG applicable type of incoshare" from a partner proprietorship, and untual amount of such in the reporting period. Wa value of greater than not produce more than period, check "None listing the actual amount.

I. Part I-Transaction

A. General Instruction

This part is to be co termination filers or and the category of am change of any real pro futures, excepted invi securities by you, you when the amount invo \$1,000. Also, indicate v to a certificate of dive: to permit delayed recos information on certific Part 2634, Subpart J.) or exchange of an asse \$1,000 when the sold income of more than reported on Schedule A asset involving an amo end of the reporting pe less and earning inco reporting period (an

Schedule A). The example on the form shows the proper way to disclose Central Airlines common stock the reporting individual purchased for \$75,000 on 2/1/99. Note that on Schedule A there is an entry for the stock as well since it was still held at the end of the reporting period.

You need not report a transaction involving (1) your personal residence (unless rented out); (2) a money market account or personal savings account; (3) an asset of your spouse or dependent child if the asset meets the three-part test set forth under the instructions for Schedule A, at II.A.; (4) a holding of a "qualified blind trust," a "qualified diversified trust," or an "excepted trust"; (5) U.S. Treasury bills, notes, and bonds; (6) transactions which occurred prior to your Federal Government employment; or (7) transactions solely by and between the reporting individual, spouse, or

You will need to report any transactions made by a non-public business or commercial enterprise, investment pool, or other entity in which you, your spouse or dependent child have a direct proprietary, general partnership or other interest unless (1) the entity is an "excepted investment fund," or (2) the transaction is incidental to the primary trade or business of the entity as indicated by you on Schedule A. (See also sections V.e. and f. of the General Instructions preceding those for Schedule A.)

B. What to Show on the Form

Under identification of assets, identify the property or securities involved in the purchase, sale or exchange, and give the date of the transaction. For example, under IDENTIFICATION OF ASSETS... "GMC common stock"; under TYPE OF TRANSACTION... check type; under DATE... enter date transaction occurred; under AMOUNT OF TRANSACTION... check the category of value of the sale price, purchase price, or exchange value of the property involved in the transaction. You must also indicate whether an item was sold pursuant to

certificate of divestiture issued by the Office of Government Ethics under 5 C.F.R. Part 2634, Subpart J, to permit delayed recognition of capital gain.

Where multiple transactions have occurred which involve the same asset, you may list the item once, check purchase and/or sale, and indicate... "biweekly," "throughout year," or other appropriate frequency, and the aggregate amount of the sales and purchases. Reporting an exchange generally requires reporting two items since one item is exchanged for another.

II. Part II-Gifts, Reimbursements, and Travel Expenses

A. General Instructions

This Part is to be completed by incumbents and termination filers only. The Act requires you to disclose the receipt of certain gifts, in-kind travel expenses, and travel-related cash reimbursements by you, your spouse or dependent child from any one source other than the U.S. Government. This reporting requirement applies to gifts and reimbursements received by your spouse or dependent child to the extent the gift was not given to him or her totally independent of the relationship to you.

B. Items to Report

Report gifts received by you, your spouse or dependent child from any one source during the reporting period aggregating more than \$260, such as tangible items, or food, lodging, transportation, or entertainment; and travel-related cash reimbursements aggregating more than \$260 from any one source. A "gift" means any payment, forbearance, advance, rendering or deposit of money, or anything of value, unless consideration of equal or greater value is received by the donor. In determining which gifts and reimbursements must be reported or aggregated, exclude

1. Anything having a value of \$104 or less;

- 2. Anything receive "relatives" means an mother, son, daughter, uncle, great aunt, first wife, grandfather granddaughter, father-idaughter-in-law, b stepfather, stepmostepbrother, stepsister spouse's grandfather of fiancee;
- 3. Bequests and other 1
- 4. Suitable mementos ing individual;
- 5. Food, lodging, t or reimbursements prowithin a foreign con Government, or D.C.,
- 6. Food and beverages a gift of overnight lodgir
- 7. Anything given to totally independent of t
- 8. Gift items in the na office, such as subs periodicals;
- 9. Gifts of hospitality (the donor's personal or C.F.R. Part 2634;
- 10. Gifts and reimburse eral employment period
- 11. Reimbursements which were required to the Federal Election Ca 434).

C. What to Show on the Form

1. GIFTS - Report the identity of the source, a brief description, and the value of gifts aggregating more than \$260 from any one source which were received by you, your spouse or dependent child and which do not fall within any of the categories of exclusions enumerated above.

a. Food, Lodging, Transportation, Entertainment. Include travel itinerary, dates, and nature of expenses provided. To reach a more than \$260 aggregation, you determine whether any one or combination of the components within this gift category received from one source amounts to more than \$260 in value. For example, if you spent a weekend at a hunting lodge owned by AmCoal Corporation, and you received lodging fairly valued at \$150, food valued at \$115, and entertainment valued at \$125, the aggregate value of the gift is \$390. A gift of this nature - hospitality at a lodge owned by a corporation rather than an individual would not qualify as a "personal hospitality" exclusion. To report this gift you would show, under SOURCE... "AmCoal Corp., 1210 North St., Chicago, IL"; under BRIEF DESCRIPTION... "lodging, food, and entertainment as a guest at hunting lodge owned by AmCoal, 1/25-27/99"; and under VALUE... "\$390." b. Other Gifts - If you and your spouse each receive a

b. Other Gifts - If you and your spouse each receive a \$175 figurine from the same donor (source), the gifts have a value of more than \$260 and must be reported. To report a gift, identify the source, briefly describe the item(s), and show the value. In the case of the figurines, report on the form under SOURCE... "Artifact Co., 153 Utah St., Omaha, NE"; and under BRIEF DESCRIPTION... "two porcelain figurines." Under VALUE... "\$350" would be shown.

2. REIMBURSEMENTS - Report the source, a brief description (including a travel itinerary, dates, and the nature of expenses provided), and the value of any cash reimbursements (except those from the United States Government or otherwise excluded) aggregating more than \$260 which you, your spouse or dependent

child received from any one source. For example, if you were reimbursed \$400 for travel and lodging expenses in connection with a speech you made for the Denver Realtors Association, you would report this item on the form by showing under SOURCE... "Denver Realtors Assoc., 45 Bridge St., Denver, CO"; under BRIEF DESCRIPTION... "travel expenses for speech made in Denver: United Airlines round trip from Washington, D.C. 1/22-23/00, \$275; Denver Airport Marriott, \$125"; and under VALUE... "\$400" would be shown. If your spouse made this speech and received the reimbursement totally independent of his or her relationship to you, no information for this item need be reported.

Note: If you receive food, transportation, lodging, and entertainment or a reimbursement of official travel expenses from a non-profit tax-exempt institution categorized by the IRS as one falling within the terms of 26 U.S.C. § 501(c)(3), you must report the name of the organization, a brief description of the in-kind services or the reimbursement and the value. If known, you may also wish to note the date you received the required written approval from your agency to accept such items. See 5 U.S.C. § 4111 and 5 C.F.R. Part 410, Subpart E. You do **not** have to report an official reimbursement received **by the agency** since it will not be received by you in your personal capacity (nor by your spouse or dependent child). See 31 U.S.C. § 1353 (or other agency statute) and 41 C.F.R. Chapter 304.

Schedule C

I. Part I-Liabilities

A. General Instructions

The Act requires you to disclose certain of your financial liabilities. The examples on the form show how to report a mortgage on real estate the reporting individual held for the production of income and a promissory note. Note that you will need to disclose the date, interest rate and term (if applicable) of each liability. Also note you must disclose the highest amount

during the reporting p period. If the liability period, you may also n

B. Items to Report

Identify and give the ca which **you**, **your spou** any creditor which exc the reporting period, **ex**

- 1. a personal liability child, or to a parent, bre spouse or dependent ch
- 2. a mortgage or hon property which is the residence not used f your spouse;
- 3. a loan secured by a puriture, or appliances the purchase price of the
- 4. a revolving charge liability did not excee reporting period, and
- 5. any liability of your represents the sole fina the spouse or child, knowledge, and which assets, or activities, an derive nor expect to d benefit.

You are required to non-public company, in which you, your speinterest, unless (1) th primary trade or busin you on Schedule A, c i n v e s t m e n t sections V.e. and f. of the General Instructions preceding those for Schedule A.)

C. What to Show on the Form

Under CREDITORS (NAME AND ADDRESS), show the name and address of the actual creditor unless the reporting individual is only able to identify a fiduciary and certifies in the report that he has made a good faith effort to determine who the actual creditor is and was unable to do so, or upon his certification that such determination is otherwise impracticable. Under TYPE OF LIABILITY, briefly indicate the nature of the liability. Under DATE, enter date loan incurred; under INTEREST RATE, note the set rate or, if a variable one, the formula used to vary the rate, i.e. prime + 2%; and under TERM, show the duration of the loan. Check the category of value for the highest amount owed during the reporting period.

II. Part II-Agreements or Arrangements

A. General Instructions and Items to Report

Provide information regarding any agreements or arrangement you have concerning (1) future employment; (2) a leave of absence during your period of Government service; (3) continuation of payments by a former employer other than the United States Government; and (4) continuing participation in an employee welfare or benefit plan maintained by a former employer other than United States Government retirement benefits. This includes any agreements or arrangements with a future employer entered into by a termination filer. The example on the form shows the severance agreement under which the reporting individual expects to receive a lump sum payment from the law firm he has left in order to enter the Government. (Also note the related asset and income reported in the second example on Schedule A of the form.)

For purposes of public disclosure, you must disclose any negotiations for future employment from the point you and a potential non-Federal employer have agreed to your future employment by that employer whether or not you have settled all of the terms, such as salary, title, benefits, and date employment is to begin. Your agency may require internal disclosure of negotiations much earlier and you should seek guidance before conducting any negotiations with persons with whom you do business. A criminal statute, 18 U.S.C. § 208, applies to official actions you may take while negotiating future employment.

B. What to Show on the Form

Under STATUS AND TERMS, describe the agreement or arrangement with appropriate specificity. Under PARTIES, show the name of the organization, or entity, and (if applicable) the name and title of the official, corporate officer, or principal person responsible for carrying out the terms of the agreement or arrangement. Under DATE, show the date of any such arrangement. No report is required regarding any agreement or arrangement entered into by a spouse or dependent child.

Schedule D

I. Part I-Outside Positions

A. Items to Report

Report all outside positions held at any time during the reporting period, as well as those positions you currently hold as an officer, director, trustee, general partner, proprietor, representative, employee or consultant of (1) any corporation, company, firm, partnership, trust, or other business enterprise; (2) any non-profit organization; (3) any labor organization; (4) any educational institution; or (5) any organization other than the United States Government. **Exclude** positions

held in any religious, s and any positions solel to report on Schedule A received from acting in is required regardin spouse or dependent c

B. What to Show on t

Give the name, addres the organization, the description of the posi position. If you current block under TO, note "

II. Part II-Compensat One Source

A. General Instruction

This Part is to be con entrants only. You mi pensation in excess o duties you provided. T of your salary or other for whom you persona services even though th your employer, firm o examples on the form the business affiliat individual's compensati client of the firm for personally provided ov Part does not require compensation for these description of the servi has paid you directly, entry on Schedule A reporting period for Scl business affiliation mo will appear only in this

B. Items to Report

Report the nature of the duties performed or services rendered for any person (other than the United States Government) from which compensation in excess of \$5,000 in either of the two preceding calendar years or the present calendar year was received by you or an entity which billed for your services (business affiliation). Exclude: (1) information to the extent that it is considered confidential as a result of a privileged relationship established by law, or (2) information about persons for whom services were provided by a business affiliation of which you were a member, partner or employee unless you were directly involved in the provision of the services. The name of a client of a law firm is not generally considered confidential. No report is required regarding compensation paid to your Spollsbatte Sependenthen Florm

Under SOURCE, give the name and address of the person to whom services were provided, for example, "Newark Real Estate Co. (Newark, NJ)"; and under BRIEF DESCRIPTION, the title or other brief functional description of the services rendered, for example: "tax matters researched for above firm while an associate with Quinn and Ouspensky."

Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., and 5 C.F.R. Part 2634 of the Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report

may also be disclosed upon request to any requesting person pursuant to section 105 of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of a violation or potential violation of law or regulation; (2) to a court or party in a court or Federal administrative proceeding if the Government is a party or in order to comply with a judge-issued subpoena; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or decision; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget (OMB) during legislative coordination on private relief legislation; and (6) in response to a request for discovery or for the appearance of a witness in a judicial or administrative proceeding, if the information is relevant to the subject matter. See also the OGE/GOVT-1 executive branchwide Privacy Act system of records. Knowing and willful falsification of information, or failure to file or report information required to be reported by section 102 of the Act, may subject you to a civil monetary penalty and to disciplinary action by your employing agency or other appropriate authority under section 104 of the Act. Knowing and willful falsification of information required to be filed by section 102 of the Act may also subject you to criminal prosecution.

This collection of information is estimated to take an average of three hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Associate Director for Administration,

U.S. Office of Govern 1201 New York Av 20005-3917. **Do not** f this address; submit the on page 3.

Pursuant to the Paperw an agency may not con required to respond to, it displays a currently number, 3209-0001, is right-hand corner of the 278).

Important Note on R Category Items on So 278:

For assets, income, tra \$1,000,000 in value th or dependent children column. For such iter either singly or jointly children, you must ma value, as appropriate liabilities, the higher \$5,000,000; \$5,000,000 \$50,000,000; and ove higher categories are \$1,000,000. Asterisked explain these high requirements.

SF 278 (Rev. 03/2000) 5 C.F.R. Part 2634

Executive Branch Personnel PUBLIC FINANCIAL DISCLOSURE REP(

U.S. Office of Government Ethics								
Date of Appointment, Candidacy, Election, or Nomination (Month, Day, Year)	Reporting Status (Check Appropriate Boxes)	Incumbent	Calendar Year Covered by Report	N	lew Entrant, lominee, or andidate		Termination Filer	Termination Date (If Applicable) (Month, Day, Year)
	Last Name	1			First Name	and Middle In	itial	
Reporting Individual's Name	LAGET VIIIIC				That I value	and Widdle III	itta	
Position for Which Filing	Title of Position				Department	or Agency (I)	f Applicable)	
Location of Present Office (or forwarding address)	Address (Number, Street	et, City, State, a	und ZIP Code)				Telephone No. ((Include Area Code)
Position(s) Held with the Federal Government During the Preceding 12 Months (If Not Same as Above)	Title of Position(s) and I	Date(s) Held						
Presidential Nominees Subject to Senate Confirmation	Name of Congressional C	Committee Consi	dering Nomination		Do You Inte	end to Create a	a Qualified Divers	sified Trust?
Certification	Signature of Reporting I	ndividual					Date (Month, L	Day, Year)
I CERTIFY that the statements I have made on this form and all attached schedules are true, complete and correct to the best of my knowledge.								
Other Review (If desired by agency)	Signature of Other Revie	wer					Date (Month, L	Oay, Year)
Agency Ethics Official's Opinion	Signature of Designated	Agency Ethics O	fficial/Reviewing Official	Į.			Date (Month, L	Day, Year)
On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments in the box below).								
	Signature						Date (Month, L	Day, Year)
Office of Government Ethics Use Only								
Comments of Reviewing Officials (If additional addition	onal space is required, u	se the reverse s	ide of this sheet)					
			(Check ł	oox if f	iling extensio	n granted &	indicate number	of days)
					(Che	ck hox if com	nments are contin	nued on the reverse side)

Supersedes Prior Editions, Which Cannot Be Used.

278-112

This form was electronically produced by Elite Federal Forms, Inc.

Reporting I	ndividual's Name												S	CI	H	Z D	Ul	LE	E A	\							
	Assets and Income									Ass																	If "l Blocl
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For you, report ea	your spouse, and dependent chile ach asset held for investment of	dren, r the																	Ту	pe							A
production exceedin period, o income d such incon For your amount of from the report the income o	n of income which had a fair market g \$1,000 at the close of the report which generated more than \$20 uring the reporting period, together ne. self, also report the source and at earned income exceeding \$200 (other U.S. Government). For your sport e source but not the amount of earlief more than \$1,000 (except report ount of any honoraria over \$200 of	value rting 00 in with ctual r than ouse, arned rt the	None (or less than \$1,001)	\$1,001 - \$15,000	\$15,001 - \$50,000	\$50,001 - \$100,000	\$100,001 - \$250,000	\$250,001 - \$500,000	\$500,001 - \$1,000,000	Over \$1,000,000*	\$1,000,001 - \$5,000,000	\$5,000,001 - \$25,000,000	\$25,000,001 - \$50,000,000	Over \$50,000,000	Excepted Investment Fund	Excepted Trust	Qualified Trust	Dividends	Rent and Royalties	Interest	Capital Gains	None (or less than \$201)	\$201 - \$1,000	\$1,001 - \$2,500	\$2,501 - \$5,000	\$5,001 - \$15,000	\$15,001 - \$50,000
	Central Airlines Common					х												х						х			
Examples	Doe Jones & Smith, Hometown, State			┢	х	┢-		 		 	_	 	_	_	_	_	_	—		┣.				-	_	t —	-
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	ntegory applies only if the asset/income is solel n, mark the other higher categories of value, as	•		filer's	s spot	ise oi	depe	enden	nt chi	ldren.	If th	e ass	et/inc	come	is eit	ner th	nat of	the f	iler o	r joir	ıtly h	eld b	y the	filer	with	the s	pouse

Reporting Individual's Name									SC	CH			J L e on						ue	ed —					
Assets and Income						t ion f rep										I	nc 0	me the	e: ty r en	pe	and is r	l an need	10ui led i	nt. in E	If "l Block
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	None (or less than \$1,001)	\$1,001 - \$15,000	\$15,001 - \$50,000	\$50,001 - \$100,000	\$100,001 - \$250,000	\$250,001 - \$500,000	\$500,001 - \$1,000,000	Over \$1,000,000*	\$1,000,001 - \$5,000,000	\$5,000,001 - \$25,000,000	\$25,000,001 - \$50,000,000	Over \$50,000,000	Excepted Investment Fund	Excepted Trust	Oualified Trust	Dividends	Rent and Royalties	Interest	Capital Gains	None (or less than \$201)	\$201 - \$1,000	\$1,001 - \$2,500	\$2,501 - \$5,000	\$5,001 - \$15,000	\$15,001 - \$50,000
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* This category applies only if the asset/income is solely that of the filer's spouse or dependent children. If the asset/income is either that of the filer or jointly held by the filer with the spouse children, mark the other higher categories of value, as appropriate.

SF 278 (Rev. 03/2000)	
5 C.F.R. Part 2634	

Do not complete Schedule B if you are a new entrant, nominee, Vice Presidential or Presidentia

U.S. Office of Government Ethics									
Reporting Individual's Name		SCHEDU	JLI	ΞB	3				
Part I: Transactions									
Report any purchase, sale, or exchange by you, your spouse, or dependent children during the reporting period of any real property, stocks,	Do not report a transaction involving property used solely as your personal residence, or a transaction solely betwe			ansact					
bonds, commodity futures, and other securities when the amount of the transaction exceeded \$1,000. Include transactions that resulted in a	you, your spouse, or dependent child. Check the "Certificate of divestiture" block to indicate sales made pursuant to	o a	Purchase	Sale	Exchange	Date (Mo, Day, Yr.)	\$1,001 - \$15,000	\$15,001 - \$50,000	\$50,001 -
Example Central Airlines Common	entification of Assets		х			2/1/99			x
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* This category applies only if the asset/income is solely th children, mark the other higher categories of value, as app		et/income is either that	of the f	iler or	jointly	held by the fi	iler wit	h the s	spouse
Part II: Gifts, Reimbursemer For you, your spouse and dependent children, rep description, and the value of: (1) gifts (such as tan lodging, food, or entertainment) received from one \$260, and (2) travel-related cash reimbursements r totaling more than \$260. For conflicts analysis, it for receipt, such as personal friend, agency approved the statutory authority, etc. For travel-related g	ort the source, a brief gible items, transportation, source totaling more than eceived from one source is helpful to indicate a basis val under 5 U.S.C. § 4111 or	e U.S. Government latives; received by you; or provided a gregating gifts to dee instructions for o	y you as per leterm	r spo sona ine t	ouse o l hosp he tot	or dependen pitality at th tal value from	t chile e dor	d tota 10r's r	ally i resid
Source (Name and Address)			Bri	ef Des	criptio	n			
Examples Nat'l Assn. of Rock Collectors, NY, NY	Airline ticket, hotel room & meals incident	to national conference	5/15/99	(pers	onal ac	ctivity unrelate	ed to di	ıty)	
Frank Jones, San Francisco, CA	Leather briefcase (personal friend)								
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4									
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SF 278 (Rev. 03/2000)
5 C.F.R. Part 2634
U.S. Office of Government Ethics

Reporting Individual's Name

Do not complete Schedule B if you are a new entrant, nominee, Vice Presidential or Presidentia

Reporting Individual's Name	SCHEDULE B (Use only if no				ıed			
Part I: Transactions								
			ansact					
		Purchase	Sale	Exchange	Date (Mo, Day, Yr.)	,001 - 5,000	5,001 - 0,000	\$50,001 - \$100,000
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	hat of the filer's spouse or dependent children. If the asset/income is either that of							

U.S. Off	rice of Government Ethics								
Repoi	ting Individual's Name	SCI	HEDU	LE C	l				
Pal	rt I: Liabilities		None						_
one c perio childr	rt liabilities over \$10,000 owed to any reditor at any time during the reporting d by you, your spouse, or dependent ren. Check the highest amount owed the reporting period Exclude	a mortgage on you personal residence unless it is rented out; loans secured by automobiles, household furniture or appliances; and liabilities owed to certain relatives listed in instructions. See instructions for revolving charge accounts	Date Incurred	Interest Rate	Term if applicable	\$10,001 - \$15,000	\$15,001 - \$50,000	\$50,001 - \$100,000	100 001
	Creditors (Name and Address)	Type of Liability			1	<i>9</i> , <i>9</i> ,	97 97		_
Examp	First District Bank, Washington, DC	Mortgage on rental property, Delaware	1991 1999	10%	25 yrs.	├	├	Х	F
2	John Jones, 123 J St., Washington, DC	Promissory note	1999	10%	on demand				
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Repor	rt II: Agreements or And the your agreements or arrangements for: (1) by ee benefit plan (e.g. pension, 401K, definuation of payment by a former employer agree.	continuing participation in an of absence; a erred compensation); (2) of these arran				nstruct	tions r	egardi	n
Examp	Pursuant to partnership agreement will re	nd Terms of any Agreement or Arrangement ceive lump sum payment of capital account & partnership share calcu	llated on servi	ce	Doe Jones &	Smith, I	Hometov		e
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SF 278 (Rev. 03/2000) 5 C.F.R. Part 2634 U.S. Office of Government Ethics			
Reporting Individual's Name		SCHEDULI	E D
Report any positions held during th not. Positions include but are not li partner, proprietor, representative, partnership, or other business enter		compensated or organization or eduction, firm, or political	eational institution. Exclude position l entities and those solely of an honor
Nat'l Assn. of Rock Collectors.	ion (Name and Address)	Type of Organization Non-profit education	n Position President
Examples Doe Jones & Smith, Hometown		Law firm	Partner
3 4 5 6			
Report sources of more than \$5,000 affiliation for services provided dire period. This includes the names of partnership, or other business enter	compensation received by you or your celly by you during any one year ofthe re- clients and customers of any corporation	reporting you directly provided the	when President e or payment of more than \$5,000. Y
Source (Name and Address) Doe Jones & Smith, Hometown, S	¹!toto	Logal comings	Brief Description of Duties
Examples — — — — — —	ones & Smith), Moneytown, State	Legal services Legal services in connection with un	iversity construction
Metro University (client of Doe 3	ones & Simili), Moneytown, State	Legal services in connection with un	iversity construction